



O'BRIEN & GERE

26 October 1989

Mr. Stephen W. Holt
Senior Environmental Engineer
NL Industries, Inc.
Wyckoff Mills Road
Hightstown, New Jersey 08520

File: 2844.012

Re: Taracorp Feasibility Study

Dear Steve:

The USEPA letter, received October 4, 1989, commented on the areas targeted for remediation surrounding the Taracorp Site in Granite City, Illinois. A meeting is scheduled for October 30 in Chicago to discuss with the IEPA and USEPA remediation areas and depths. To assist in this process, enclosed are 100 scale aerial photographs of the site and surrounding community. These are the Figures used during our Development of Alternatives meeting held February 8 in Chicago. For the purposes of this meeting the proposed remedial areas have been deleted and the 3-6 inch sample results have been added. These figures coupled with the attached zoning map provide an excellent indication of current or predicted land use in the study area.

The Draft Preliminary Feasibility Study Report (Draft Report) submitted to the agencies in August presented a basis for the selection of certain areas for remediation. A fundamental assumption in developing that document was the need to define, prior to any construction activities, the areas to be remediated and the depth of remediation. This was considered necessary to minimize disruptions to the community during construction. Therefore, the soil lead data generated during the Remedial Investigation was used to estimate concentrations in residential and commercial properties not specifically sampled.

Attached to the comment letter was a September 1, 1989 USEPA policy memorandum which established an "interim soil cleanup level for total lead, at 500 to 1000 ppm .. consider protective for direct contact at residential settings". We have reevaluated the areas identified in the Draft Report for remediation and believe they are consistent with the policy memorandum. Those areas not targeted for remediation do not meet the residential land use and soil lead concentration criteria for remediation included in that memorandum.

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The objective of the October 30 meeting will be to discuss the rationale used in remediation area and depth definition. Selection of specific blocks for remediation should also be a topic of discussion. Ideally, at the close of the meeting an agreement on extent of soil removal will be reached. Achieving that end will allow the submission of the Final Preliminary Feasibility Study Report required by the Consent Order.

I will be traveling on October 27 and will call your office to discuss the proposed meeting agenda.

Very Truly Yours,

O'BRIEN & GERE ENGINEERS, INC.

F.D. HALE 002

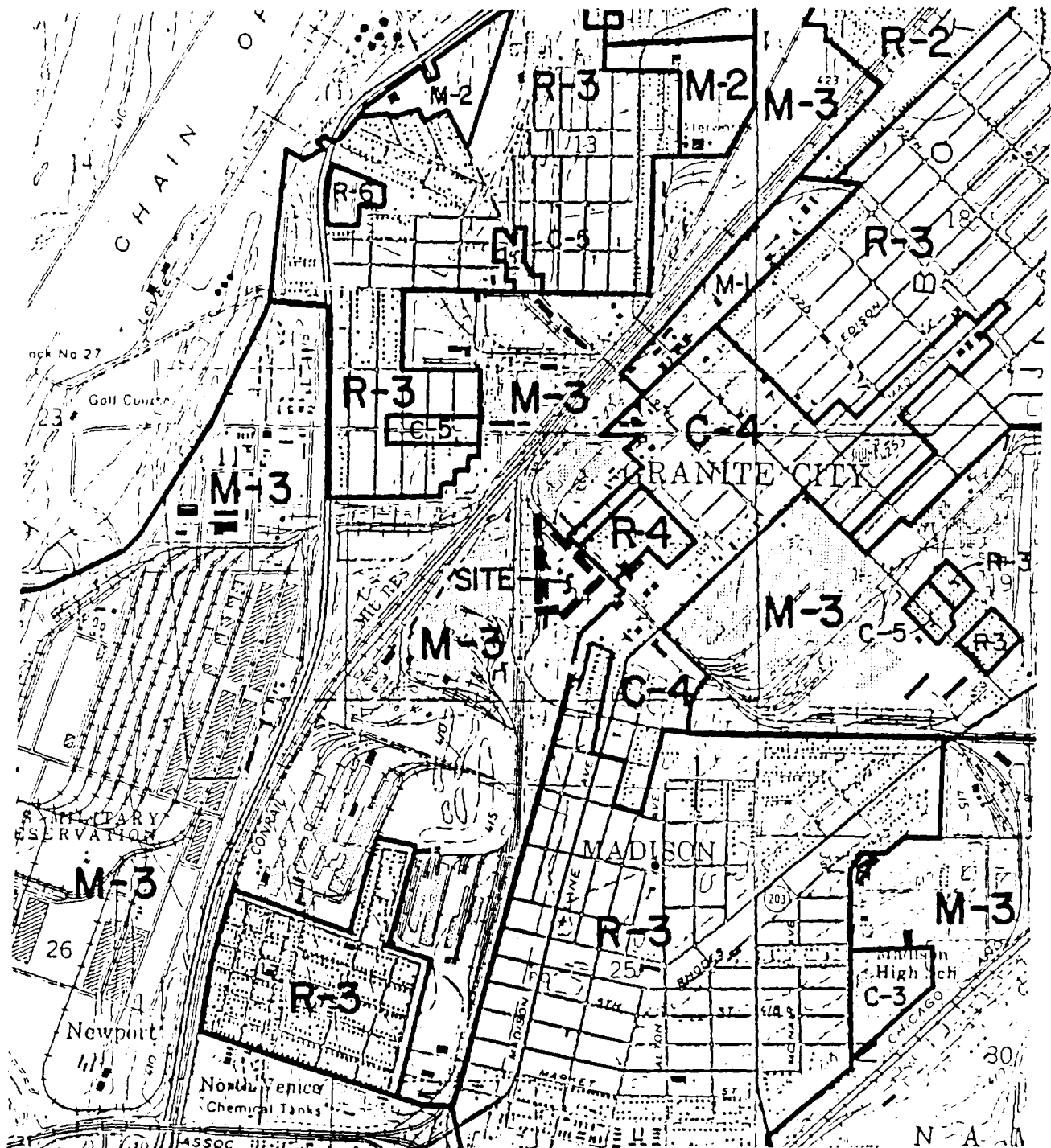
Frank D. Hale, P.E.
Managing Engineer

FDH:bh
Enclosures

cc: Brad Bradley
Ken Miller
Janet Smith

NL INDUSTRIES GRANITE CITY SITE LAND USE MAP

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LEGEND

- | | |
|-----------------------------|---------------------------------|
| R-1 SINGLE FAMILY RESIDENCE | C-1 OFFICE COMMERCIAL |
| R-2 SINGLE FAMILY RESIDENCE | C-2 NEIGHBORHOOD COMMERCIAL |
| R-3 SINGLE FAMILY RESIDENCE | C-3 COMMUNITY SERVICE |
| R-4 TWO FAMILY RESIDENCE | C-4 CENTRAL BUSINESS COMMERCIAL |
| R-5 MULTI-FAMILY RESIDENCE | C-5 HIGHWAY COMMERCIAL |
| R-6 MOBILE HOME RESIDENCE | C-6 PLANNED COMMERCIAL |
| M-1 WAREHOUSE INDUSTRIAL | M-3 HEAVY INDUSTRIAL |
| M-2 LIGHT INDUSTRIAL | M-4 PLANNED INDUSTRIAL |

SCALE IN MILES

